

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Case No. 1:20-cr-00623-JSR-1

V

WILLIE DENNIS

AFFIDAVIT IN SUPPORT OF THE  
RE-FILED MOTION TO PERMIT  
LIMITED APPEARANCE, *PRO  
HAC VICE*, AND *PRO BONO*, ON  
BEHALF OF THE DEFENDANT  
SOLELY FOR DEFENDANT'S  
MOTION FOR COMPASSIONATE  
RELEASE

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COMES NOW the undersigned, and files this Affidavit In Support Of The Re-Filed Motion To Permit Limited Appearance, *Pro Hac Vice*, and *Pro Bono*, and would affirm, under oath, the following:

**AFFIDAVIT OF ATTORNEY APPLICANT**

1. The undersigned has been an active member of the Florida Bar since May 22, 1975, Florida Bar # 192303, and is also an active member of the bar of the United States District Court, Northern District Of Florida, where he maintains a PACER account..
2. The undersigned seeks to appear on behalf of the Defendant in this matter *pro bono*, solely with regards to legally assisting the Defendant in presenting to this Court the Defendant's *pro se* Motion For Sentence Reduction Under 18 U.S.C. Section 3582 ( c )(1)(A) (Compassionate Release) which was attached to the previously filed motion as Exhibit "A", consisting of a six (6) page Motion, along with a five (5) page "Inmate Request To Staff" . .
3. The Defendant represented himself at trial. However, per order of this Court, he is represented for criminal appellate purposes only by Attorney David Jason Cohen, a member of the New York Bar, and who graciously supports both of these Motions.

4. The Defendant has limited physical abilities, uncertain cognitive capacity, and an emotional state of mind that precludes him from presenting this matter to the Court objectively. I have also attached to the original motion as Exhibit "B", consisting of six (6) pages, a copy of some of the Defendant's medical records he forwarded to me in reference to his medical condition as of November 30, 2023.

5. The undersigned is prepared to appear before the court with a 72-hour notice window to support this request in person, and would set forth as grounds therefor the three (3) page letter attached to the original motion as Exhibit "C" which was submitted on January 29, 2021, at defense counsel's request, in support of leniency for the Defendant at the sentencing.

6. The applicant further represents that:

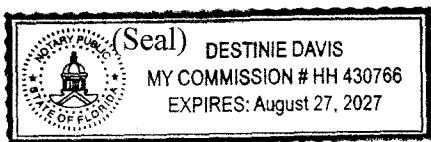
- a. I have never been convicted of a felony.
- b. There are no disciplinary proceedings presently pending against me.
- c. I was subject to a one (1) year suspension from the Florida Bar in 1990..
- d. As an explanation, the Florida Supreme Court opinion about the matter described in "c" above is cited at 563 So. 2d 81 (Fla 1990).

FURTHER AFFIANT SAYETH NOT.



**NOTARY ACKNOWLEDGEMENT**

The aforementioned **James T. Golden**, who was personally known to me, signed and affirmed before me this 22 day of February, 2024, that the matters contained in the "Affidavit of Attorney Applicant" above are true and correct.




Notary Public

WHEREFORE the undersigned requests that the Re-Filed Motion To Appear Pro Hac Vice, and Pro Bono, be granted and that a hearing on the Defendant's Motion For Compassionate Release be set, or that the court *sua sponte* grant the Defendant's Motion For Compassionate Release immediately.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by e-mail to Attorney David Cohen, at [david@cfblaw.com](mailto:david@cfblaw.com), [sarah.kushner@usdoj.gov](mailto:sarah.kushner@usdoj.gov), [kimberly.ravener@usdoj.gov](mailto:kimberly.ravener@usdoj.gov), [marguerite.colson@usdoj.gov](mailto:marguerite.colson@usdoj.gov), and [stephanie.simon2@usdoj.gov](mailto:stephanie.simon2@usdoj.gov), at The Southern District of New York, U.S. Attorney Office, 1 St. Andrews Plaza, New York, NY 10007, this 22nd day of February, 2024



**REV. JAMES T. GOLDEN, ESQUIRE**  
Attorney-At-Law  
P.O.B. 299  
Bradenton, Florida 34206  
E-Mail: [jtgoldenlaw@aol.com](mailto:jtgoldenlaw@aol.com)  
Phone: (941) 746-6485  
Mobile: (941-773-4031)  
Florida Bar Number 192303